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February 4, 2025

Via ECF

Hon. Edgardo Ramos
United States District Court for the Southern
District of New York
40 Foley Square
New York, New York 10007

Re: *Smith et al. v. Scavino*, 1:24-mc-00566-ER (S.D.N.Y.)

Dear Judge Ramos,

We write on behalf of Movants in the above-captioned matter to enforce a non-party subpoena *duces tecum* (the “Subpoena”) to Respondent Daniel Scavino Jr.

In the Court’s January 15, 2025 Order (the “Order”), Movants were directed to serve Mr. Scavino with the Order and file proof of service on ECF. ECF No. 6. On January 16, 2025, Movants sent the Order to Mr. Scavino’s counsel, Stanley Woodward, *see* Ex. A, pursuant to his agreement to accept service for Mr. Scavino in this action, *see* Ex. B.¹

On January 20, 2025, Mr. Woodward filed a motion to withdraw as counsel for Defendant Kelly Meggs in *Smith v. Trump*, 1:21-cv-02265-APM (D.D.C.) because he was appointed Assistant to the President and Senior Counselor in Donald Trump’s new administration, *see* ECF No. 362. In light of this new role, Mr. Woodward dissolved his law firm. *Id.* On January 21, 2025, Movants emailed Mr. Woodward to ask if he would still be representing Mr. Scavino in this action, and if not, to please let Movants know who would be representing Mr. Scavino. *See* Ex. C. Mr. Woodward did not respond, therefore, out of an abundance of caution, Movants mailed a copy of the Order via FedEx to Mr. Scavino’s home in New York where they originally served the Subpoena. *See* Ex. D.

Movants respectfully request leave to file a FedEx proof-of-service delivery notice, showing a ship date of February 3, 2025 and delivery date of February 4, 2025. Movants

¹ Despite his agreement to accept service, Mr. Woodward has not appeared in this action.

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request to file this document under seal because it contains Mr. Scavino's home address,
and to file a redacted copy of the same on the public docket.

Sincerely,

A handwritten signature in blue ink, appearing to be 'J. Margolin', with a stylized flourish at the end.

Joshua S. Margolin
Partner

Encl: Exhibits A-D